TRUSTED ADVISORS

4304 92ND AVENUE NW
GIG HARBOR, WA 98335

253.851.6700 WWW.MILLERISAR.COM

ANDREW O. ISAR

Via Electronic Comment Filing System

October 13, 2021

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 9050 Junction Drive Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: nWise AB, Direct Video Numbering Directory Access Application Supplement,

Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals

with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

nWise AB ("nWise") submits the attached supplement to its pending December 17, 2020 *Direct Video Numbering Directory Access Application* ("Supplement") in the above referenced proceedings. By its Supplement, nWise provides additional detailed information demonstrating its legitimate need and eminent qualification for direct Telecommunications Relay Service Numbering Directory access, as well as its awareness of, and compliance with, attendant regulatory obligations as a Qualified Direct Video Entity ("DVE"), consistent with the Commission's recent DVE rulings. nWise respectfully requests that the Commission approve its *Direct Video Numbering Directory Access Application* on an expedited basis.

Thank you for your attention to this matter. Questions may be directed to me.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar Andrew O. Isar

Consultants to nWise AB

Attachment



Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

| In the Matter of |) | |
|--|---|-----------------------|
| Structure and Practices of the Video Relay |) | CG Docket No. 10-51 |
| Service Program |) | CC Dealest No. 02 122 |
| Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities |) | CG Docket No. 03-123 |
| | , | |

To the Federal Communications Commission Chief, Consumer and Governmental Affairs Bureau:

DIRECT VIDEO NUMBERING DIRECTORY ACCESS APPLICATION SUPPLEMENT

Magnus Almén Chief Executive Officer nWise AB Salagatan 16A SE-753 30 Uppsala Sweden Telephone: +46 8 1200 2600 Direct (USA): 415.854.8159 Email: magnus.almen@nwise.se

October 13. 2021

SUMMARY

nWise AB, pursuant to Section 64.613(c) of the Commission's rules, 47 C.F.R. §64.613(c), submits to the Commission this supplement to nWise's pending Direct Video Numbering Directory Access Application in the above-referenced proceeding. By this supplement, nWise provides additional information demonstrating the Company's legitimate need for TRS numbering Directory access and awareness of, and compliance with, attendant regulatory obligations now further in accordance the Commission's findings regarding the application of Communication Service for the Deaf, Inc. for access to the Telecommunications Relay Services Numbering Directory as a Qualified Direct Video Entity.

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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

| In the Matter of |) | |
|---|---|----------------------|
| Structure and Practices of the Video Relay Service Program |) | CG Docket No. 10-51 |
| Telecommunications Relay Services and Speech-to-Speech Services for Individuals |) | CG Docket No. 03-123 |
| with Hearing and Speech Disabilities |) | |

To the Federal Communications Commission Chief, Consumer and Governmental Affairs Bureau:

DIRECT VIDEO NUMBERING DIRECTORY ACCESS APPLICATION SUPPLEMENT

nWise AB ("nWise" or "Applicant"), pursuant to Section 64.613(c) of the Commission's rules, 47 C.F.R. §64.613(c), submits to the Commission this supplement to nWise's pending *Direct Video Numbering Directory Access Application* in the above-referenced proceeding.¹ By this supplement, nWise provides additional information demonstrating the Company's legitimate need for TRS numbering Directory access and awareness of, and compliance with, attendant regulatory obligations now further in accordance the Commission's findings regarding the application of Communication Service for the Deaf, Inc. ("CSD") for access to the Telecommunications Relay Services Numbering Directory ("Directory") as a Qualified Direct Video Entity.² With the

¹ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Direct Video Numbering Directory Access Application, nWise AB (December 17, 2020) [Application]. The authority sought under nWise Application is intended solely for its own use and is entirely independent of any existing relationship with relay service providers, technology partners, or other organizations in the U.S. or elsewhere. Pursuant to Section 64.613(c)(1)(v) of the Commission's rules, 47 C.F.R. § 64.613(c)(1)(v), nWise's Application already contains an officer's certification that the description of its proposed service meets the definition of "direct video customer support" and that the information provided therein, is accurate and complete.

² Id. Public Notice, DA 21-682 (June 11, 2021) [Public Notice].

additional information provided by this supplement, nWise respectfully requests that the Commission deem nWise's pending Application complete and grant nWise's Application on an expedited basis.

I. INTRODUCTION

nWise hereby provides the Commission with supplemental information to its pending Application, demonstrating the Company's "legitimate need for [Telecommunications Relay Service ("TRS")] numbering Directory access," and "awareness of [and compliance with attendant] regulatory obligations." Specifically, nWise provides additional evidence demonstrating its intended use – need – for access to the TRS Numbering Directory, its compliance with attendant rules and administrator technical specifications, and detailed technical procedures for direct video communications ("DVC") call initiation and DVC to video relay service call transfers.

On June 11, 2021, the Commission's approved CSD's direct video numbering directory access application. In approving CSD's application, the Commission provided explicit criteria and considerations for TRS numbering directory access, that had not been reflected in nWise's pending Application. With the benefit of the Commission's findings, nWise supplements its Application to address those specific criteria and considerations. Further, nWise incorporates additional evidence regarding its technical and operational capabilities originally contained in its Petition for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules and Request for Declaratory Ruling Authorizing Access to the TS Numbering Directory for the Provision of Direct Video Services and Other Point-to-Point

³ Public Notice at page 1, footnote in original omitted.

Communication Solutions for the Deaf Community,⁴ which had been withdrawn as moot at the time nWise's Application was filed. And nWise provides additional evidence of the commercial desirability for its proposed DVC offerings and focus on serving the DeafBlind and other underserved members of the Deaf community, including enhanced teletype ("TTY") to Real-Time Text ("RTT") usage.

nWise has developed and deployed its "MMX" communications and call distribution platform in Europe and the U.S. to enable the Deaf, including DeafBlind, communicate effectively. In Europe, the MMX platform has proven effective in enhancing communication access: RTT is used both by text-based and video-based applications provided in conjunction with relay services, while also available to members of the hearing community - supporting services, relatives and friends of the Deaf and DeafBlind communities, enhancing functional equivalency by enabling direct communication between members of the DeafBlind community, between DeafBlind and Deaf, and DeafBlind and hearing communities. nWise's proposed DVC offering in the U.S. will now enable small business and support services to the Deaf, including DeafBlind, community to have direct contact with individuals that use video combined with RTT. nWise is committed to promoting RTT usage in the U.S. and is currently in talks with state relay service program administrators and others on how to implement modern RTT technology at the state level to replace archaic TTY.

As set forth in its Application, now supplemented by the information presented below, nWise demonstrates its legitimate need for TRS numbering Directory access and awareness of and

⁴ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Petition for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules and Request for Declaratory Ruling Authorizing Access to the TRS Numbering Directory for the Provision of Direct Video Services and Other Point-to-Point Communication Solutions for the Deaf Community, nWise AB (March 1, 2019) withdrawn as moot on December 17, 2020.

compliance with attendant regulatory obligations, and requests that the Commission grant its pending Application on an expedited basis.

II. THE COMMISSION HAS EXPLICITLY ESTABLISHED SPECIFIC CONSIDERATIONS FOR GRANTING DVC AUTHORITY.

The Commission's June 11, 2021 *Public Notice* granting CSD access to the TRS Numbering Directory as a qualified DVC explicitly established considerations that had not been as clearly recognized under the requirements of Section 64.613(c)⁵ at the time nWise filed its Application. Among them, the need for applicants to demonstrate "a legitimate need for access to the TRS Numbering Directory and an awareness of its regulatory obligations."

nWise's obligations for compliance with attendant regulatory obligations had readily been understood at the time its Application was submitted.⁶ Now the *Public Notice's* findings, coupled with the type of supplemental information CSD submitted in support of its application, specifically regarding privacy, security, reliability, interoperability, TRS Numbering Administrator coordination, and the processes for call initiation and DVC call transfers to VRS providers, provides additional guidance into the specificity of the information necessary to fully support nWise's Application.

In accordance with the Commission's findings and additional detailed information deemed necessary for successful demonstration of compliance with attendant regulatory obligations, nWise hereby supplements its pending Application as follows.

⁵ 47 C.F.R. §64.613(c).

⁶ "These obligations include compliance with the rules and regulations governing VRS providers' access to use of the Directory, instructions of the TRS Numbering administrator, and applicable standards pertaining to privacy, security, reliability, and interoperability." *Public Notice* at 2, citing to 47 CFR § 64.613(c)(5); Direct Video Access Order, 34 FCC Rcd at 3405, para. 16 & n.58.

III. nWISE POSSESSES THE TECHNICAL CAPABILITIES TO ACCESS THE TRS NUMBERING DATABASE TO PROVIDE DVC.

On March 1, 2019, nWise submitted a petition for waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's regulations⁷ to gain direct access to the TRS Numbering Directory and provide direct video services and other point-to-point communications services for the Deaf Community ("Petition").⁸ nWise's Petition was submitted prior to the Commission's adoption of amendments to Sections 64.611, 64.613, and 64.615 of its rules, 47 CFR §§ 64.611, 64.613, and 64.615 that became effective on October 29, 2020.⁹ Adoption of these amendments rendered nWise's Petition moot, and nWise withdrew its Petition on December 17, 2020, accordingly.¹⁰ nWise's Petition contained detailed discussion regarding nWise's technical competency and capabilities, now incorporated herein as supplemental information in support of nWise's pending Application, given that its Petition was withdrawn and no longer a matter of record in this proceeding.

A. nWise is Well Qualified to Access the TRS Numbering Directory and Provide DVC in Compliance with Applicable Regulations and Policies.

nWise is an established¹¹ advanced technology solutions leader in the development and implementation of DVC, RTT and other point-to-point communications solutions for the Deaf,

⁷ 47 C.F.R. §§ 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c).

⁸ See, Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speechto Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Petition for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules and Request for Declaratory Ruling Authorizing Access to the TRS Numbering Directory for the Provision of Direct Video Services and Other Point-to-Point Communications Solutions for the Deaf Community, nWise AB (March 1, 2019) [Petition].

⁹ Id, Public Notice announcing the effective date of the Commission's Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396 (2019) (2019 VRS Program Management Order).

¹⁰ *Id.* Letter to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, from Andrew O. Isar, Miller Isar, Inc. requesting withdrawal on behalf of nWise AB [December 17, 2020].

¹¹ The MMX® technology nWise has designed and incorporated into its applications had been available via Ericsson to telecom operators in Europe including Deutche Telecom (Germany), Telia (Sweden), Telenor (Norway), YouSee (Denmark), and Vodafone (UK) since the early 2000s. nWise was founded in 2008 after a management buyout from Ericsson and has since owned and pursued further development of its MMX® technology. Several former Ericsson

DeafBlind and Hard of Hearing communities and speech impaired in Europe and Asia. nWise's mission is to enable everyone, regardless of their functional variation due to physical capabilities or challenges, to access important public services, including emergency and healthcare services, businesses, and friends and family, easily and effectively, *i.e.* to have access to communications services in a functionally equivalent manner to those without hearing and sight impairment.

The Company provides its communications technology for 14 government-run relay service programs in Europe and Asia. In Europe, nWise provides DVC, RTT, and other communications solutions to emergency and healthcare services and commercial enterprises in Sweden, the Netherlands and the United Kingdom including, including the National Health Services (England, Scotland, and Wales), the National Administration of Special Education (Sweden), and private enterprises in Germany including insurance companies and employment agencies. In the Netherlands, nWise serves schools for the Deaf Community and emergency service providers. And, in conjunction with PolarPrint in Sweden¹² and Access256 Productions, LLC in the United States,¹³ nWise has designed and implemented unique communications solutions specifically for the DeafBlind currently in use in Europe, Asia, and the U.S.

In the U.S., nWise serves as a technology partner with ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS"), a TRS Fund-eligible VRS provider since 2011, by developing and supporting GlobalVRS's automatic call distribution platform for the Deaf Community and specialized applications¹⁴ to facilitate the provision of service to DeafBlind individuals.¹⁵ In this

employees that had been working with relay services became nWise employees. Their expertise guaranteed that the technical capability and long-term experience in the field were secure.

¹² http://www.polarprint.se

¹³ https://access256.com/

¹⁴ nWise's MMX platform.

¹⁵ nWise underscores that it's pending Application seeks TRS Numbering Directory access exclusively for its own exclusive use in the provision of DVC and is entirely separate and apart from the TRS Numbering Directory access that it currently maintains on behalf of GlobalVRS.

capacity, nWise has worked with all Internet-based VRS providers on interoperability, technology, and compliance matters. And as a GlobalVRS technology provider, nWise already maintains direct access to the TRS Numbering Directory and established technical interfaces with the TRS Numbering Directory, albeit exclusively on GlobalVRS's behalf. nWise is eminently qualified and experienced to provide advanced DVC and point-to-point communications solutions in the U.S. in compliance with Commission rules and policies, and Numbering Directory administrator policies and practices.

B. nWise Has the Demonstrated Technical Capabilities to Comply with Qualified Direct Video Entities' Regulatory Obligations.

Section 64.613(c)(5) of the Commission's rules, ¹⁶ sets forth specific technical and other regulatory requirements applicable to Qualified Direct Video Entities. Among them, the provision and maintenance of current routing information in the TRS Numbering Directory for each North American Numbering Plan telephone number that it enters the directory, the ability to make point-to-point calls and receive point-to-point or VRS calls from any VRS user in accordance with all interoperability standards applicable to VRS providers, including, but not limited to, the relevant technical standards specified in Section 64.621(b); compliance with the Commission's customer proprietary network information ("CPNI") rules for relay service providers – Sections 64.5101 through 64.5111; following TRS Numbering Directory access procedures and performing related administrative functions as directed by the TRS Numbering administrator in consultation with the Managing Director and the Chief, Consumer and Governmental Affairs Bureau; and adhering to all other applicable standards pertaining to privacy, security, and reliability. nWise maintains that it complies with these obligations on behalf of GlobalVRS and is capable of separately complying on its own behalf as a Qualified DVC provider.

¹⁶ 47 C.F.R.§ 64.613(c)(5).

1. Provisioning and maintaining current routing information in the TRS Numbering Directory for each NANP telephone number that it enters in such directory (47 C.F.R. 64.613(c)(5)(i))

nWise has been provisioning and maintaining current routing information in the TRS Numbering Directory foreach North American Numbering Plan telephone number entered in the directory on behalf of GlobalVRS since 2012. Through this process, nWise has developed a well-established, automated processes for complying with the administrator's process protocols and interface requirements to ensure accurate and efficient telephone numbering uploading and verification in the TRS Numbering Directory. nWise will comply under its own behalf as a qualified DVC provider through these established processes, albeit through a separate submission process and internal numbering database that is entirely independent from that it currently uses.

2. Being able to make point-to-point calls and receive point-to-point or VRS calls from any VRS user in accordance with all interoperability standards applicable to VRS providers, including, but not limited to, the relevant technical standards specified in § 64.621(b); (47 C.F.R. 64.613(c)(5)(ii))

nWise is capable of completing point-to-point calls and receive point-to-point or VRS calls from any VRS user in accordance with all interoperability standards applicable to VRS providers as detailed in Section IV below. nWise complies with the technical standards set forth in Section 64.621(b)¹⁷ as evident through its long-standing technical coordination with The MITRE Corporation ("MITRE"), the VRS SIP Interoperability Council and provision of such calls on

¹⁷ § 64.621 Interoperability and portability. (b) *Technical standards for interoperability and portability.* (1) Beginning no later than December 20, 2017, VRS providers shall ensure that their provision of VRS and video communications, including their access technology, meets the requirements of the VRS Provider Interoperability Profile. (2) Beginning no later than October 24, 2017, VRS providers shall provide a standard xCard export interface to enable users to import their lists of contacts in xCard XML format, in accordance with IETF RFC 6351.

behalf of GlobalVRS. nWise can provide such calls as a qualified DVC provider immediately upon the grant of its pending Application.

nWise has also consistently tested RTT compatibility of its specialized application for the DeafBlind community, the "myMMX DB," with other VRS applications in the markets that use RTT, provided by GlobalVRS, and the two major VRS providers. nWise's RTT technology and experience make nWise uniquely qualified to provide DVC, particularly for the DeafBlind.

3. Protecting customer proprietary network information of any VRS user obtained in accordance with §§ 64.5101 through 64.5111 (TRS Customer Proprietary Network Information); (47 C.F.R. 64.613(c)(5)(iii))

As a vendor to GlobalVRS, nWise has certified its compliance to GlobalVRS and complied with the applicable provisions of the Commission's Customer Proprietary Network Information ("CPNI") rules for VRS providers. nWise has designated a Chief Compliance Officer to oversee the retention of CPNI data and approval of access to CPNI exclusively by Company employees who are briefed on CPNI compliance annually and affirm their understanding of CPNI requirements. CPNI is secured by encrypted and password protected databases and available only to Company authorized employees. nWise does not otherwise share CPNI with any individual or entity. The Company does not anticipate the need for CPNI sharing with other entities in its provision of DVC nor the need for separate customer CPNI sharing concurrence, accordingly. DVC customers will have their information stored in separate databases which will also be encrypted and completely independent of each other.

nWise work practices also include compliance with the European General Data Protection Regulation ("GDPR"), which includes strict rules on the access of data that contains personal information.

4. Following TRS Numbering Directory access procedures and performing related administrative functions as directed by the TRS Numbering administrator in consultation with the Managing Director and the Chief, Consumer and Governmental Affairs Bureau (47 C.F.R. 64.613(c)(5)(iv))

As stated, nWise has already been performing related administrative functions as directed by the TRS Numbering administrator in its role as a technology partner to GlobalVRS and is immanently qualified to continue doing so separately on its own behalf, independent from GlobalVRS, with the benefit of years of experience in working with the TRS numbering administrator.

nWise has through the past years acquired experience and expertise in reporting and/or providing specific information required the TRS Fund Administrator regarding call data reports and/or any other required information, in compliance with Commission regulations and compliance audits in conjunction with GlobalVRS. nWise's experience and understanding of the technical and regulatory requirements have been incorporated in its daily operational and administrative routines, and has long been part of the Company's training to current and new employees.

5. Adhering to all other applicable standards pertaining to privacy, security, and reliability (47 C.F.R. 64.613(c)(5)(v))

Notwithstanding nWise's CPNI compliance, the Company's MMX platform has been developed to the highest standards of privacy, security, reliability, and interoperability. nWise's provision of Deaf and DeafBlind communications technology, and its commercial clients, mainly European telecommunications regulators and operators, require nWise build its business on established best practices to ensure compliance with national and international standards pertaining to privacy, security and reliability.

This is accomplished through strict compliance with the following:

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- Information Security Management System, including but not limited to support procedures and controls.
- Code of Practice for Information Security Management, including but not limited to work practice and routines applied by nWise's development and operations staff.
- **Human Resources Security**, including but not limited to screening of nWise personnel and staff.
- **Physical and Environmental Security** to safeguard against unauthorized access to data and information. Security measures are routinely applied to equipment, network, and all of nWise's own data and netowrk environment.
- Access Control, including but not limited to password and credentials management,
 review of access rights of staff and accounts that access the system and services
 provided.
- Security Incident Management, including the categorization of Security incidents.

IV. NWISE PROVIDES EFFECTIVE RELAY CALL INITIATION, AND DEVELOPED AND SUCCESSFULLY TESTED CALL TRANSFER PROCEDURES FOR PLACING AND TRANSPORTING DVC CALLS

nWise's technical capabilities, practical experience in supporting VRS call initiation service since 2012, including continual platform development to comply with Commission rules as well as TRS Fund and Numbering Directory administrator technical requirements, and active participation in the SIP Interoperability sessions with all VRS providers, ensures that its platform and endpoints are fully compatible with industry standards. And as a supplier of VRS technology in 12 countries, nWise technology is among the most advanced in the industry. nWise has the demonstrated capability of providing call initiation and VRS call transfer functions as a DVC provider.

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a. nWise's Call Initiation Process.

When a Deaf caller places a call to an nWise DVC client via a video device, ¹⁸ the caller will dial the assigned DVC client telephone number. nWise's MMX platform will automatically query the TRS Numbering Directory ¹⁹ to ensure that the caller's Ten Digit Number ("TDN)" is in the iTRS database. Once the TDN is verified, the call will be automatically routed through nWise's MMX DVC platform in the same way that is currently practice by entities that have access to the database.

b. nWise's VRS Call Transfer Process.

Calls that require specialized assistance may need to be transferred to a VRS provider. Should the caller need to consult a specialist or otherwise need or request the assistance of a video interpreter, the call will be transferred to the caller's VRS default provider or the caller's VRS provider of choice. The DVC client agent will ask the caller if they wish to have an interpreter interpret a call and which VRS provider the caller would like to be connected to. If the caller wishes to be connected to their default VRS provider, the DVC client agent will access a drop-down menu in the MMX software to select the requested VRS provider and initiate an outbound call transfer.

For example, a DeafBlind caller connects to an nWise DVC client and during the call the caller seeks further information from another entity or individual, which requires a video interpreter. The nWise DVC agent will select the provider from a drop-down menu in the agent console and dial the caller's default/preferred VRS provider. If caller does not have a preferred VRS provider, the nWise DVC agent will randomly connect the call to a VRS provider. nWise's

¹⁸ Only videophones with a TDN can make calls to nWise DVC clients.

¹⁹ As is currently performed as the technology partner for its U.S. VRS client. The MMX DVC platform will be independently interfaced with the Numbering Directory.

DVC client agent will remain on the call to ensure that the call has completed to the VRS provider and will advise the caller that the agent is dropping off the call, or otherwise remain on the call at the caller's request.

When the call is transferred to the VRS provider, the Deaf caller's TDN (automatic number identification) will be automatically provided to the VRS provider through nWise's MMX software. The VRS provider will then identify if the caller is eligible for VRS calls via the TRS – User Registration Database as done for all VRS calls, and the call will be fully transferred and then interpreted by the VRS provider. Once the call is transferred to a VRS interpreter the DeafBlind caller may decide when to terminate the VRS call or the call may be terminated if the hearing party drops off the call, under normal VRS call practice. Relevant VRS call data are retained and reported to the TRS Fund Administrator by the VRS provider under current procedures.

If the number does not appear in the TRS User Registration Database, the call will not be transferred to a VRS, and a failure message will appear in the agent's DVC console with information. The caller and the DVC agent will remain connected, and the DVC agent can provide further information to the caller.

V. nWISE HAS CONFIRMED THE DESIRABILITY FOR ITS DVC SERVICES

As recently as June 15, 2021, the Deaf and Hard of Hearing Consumer Advocacy Network ("Consumer Advocacy Network"), has reiterated the need for the Commission to prioritize functional equivalency consistent with its member organizations' TRS policy statements.²⁰ The DVC nWise seeks to provide, particularly for use by DeafBlind users, brings functionally equivalency far closer for all Deaf and Hard of Hearing users, as the Consumer Advocacy Network

²⁰ See, Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speechto Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Deaf and Hard of Hearing Consumer Advocacy Network notice of exparte communications (June 15, 2021) citing to its May 13, 2021 notice of exparte communications and its member organizations' April 11, 2011 TRS Policy Statement.

states and the Commission itself has recognized.²¹ Through its specific work with the DeafBlind community organizations and prospective DVC clients, nWise has confirmed immediate demand for its proposed DVC services in furthering functional equivalency for prospective users.

For the past several years, nWise has designed and provided specialized applications for use by the DeafBlind community. DeafBlind users have been historically underserved users. Several supporting organizations that work with the DeafBlind community have asked nWise to design specialized software that would enable these organizations to connect to their DeafBlind customers directly without the intervention of a VRS provider. Healthcare specialists that work with the DeafBlind community, including nursing and support staff for DeafBlind individuals, are also interested in having a direct communications capability to their DeafBlind clients. And nWise has already been contacted by two universities that would like to have direct communications with the Deaf and DeafBlind students and staff.

The positive response nWise has received to its prospective provision of DVC underscores the significant need for the DVC nWise proposes to provide and the immediate viability of those services upon Commission approval of nWise's direct access to the TRS Numbering Directory in furtherance of functional equivalency particularly for underserved members of the Deaf community.

²¹ "Allowing VTCSecure access to the TRS Numbering Directory will enable individuals who are deaf, hard of hearing, deaf-blind or have a speech disability to move closer to obtaining the functional equivalency Congress envisioned in enacting Title IV of the ADA. As the Commission has repeatedly recognized, compared to traditional TRS, "point-to-point services even more directly support the [purposes of section 225]" because they "increase the utility of the Nation's telephone system" for persons with hearing and speech disabilities by "provid[ing] direct communication – including all visual cues that are so important to persons with hearing and speech disabilities." See, Id., Order and Declaratory Ruling, DA 17-86 (2017) at 9, citing to Telecommunications Relay Services and Speechto-Speech Service for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 821, para. 67 (2008) snf Structure and Practices of the Video Relay Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Further Notice of Proposed Rulemaking, 30 FCC Rcd 12973, 12995-6, para. 61 (2015)

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VI. CONCLUSION

By its supplement, nWise provides evidence of its "legitimate need for [Telecommunications Relay Service ("TRS")] numbering Directory access," and "awareness of [and compliance with attendant] regulatory obligations, now consistent with the Commission's recent CSD application findings. The record in this proceeding demonstrates that nWise has ample experience and already complies with applicable regulation, and that it is uniquely qualified and prepared to begin the provision of DVC to anxious clients, immediately upon a grant of the instant Application. nWise reiterates its request for expedited grant of its pending Application for authority to access the TRS Numbering Directory as a Qualified Direct Video.

Respectfully submitted this 13th day of October 2021,

nWISE AB

Magnus Almén Chief Executive Officer nWise AB

Salagatan 16A

SE-753 30 Uppsala Sweden Telephone: +46 8 1200 2600 Direct (USA): 415.854.8159 Email: magnus.almen@nwise.se

I, the undersigned, Mathias Wiberg, Notary Public of the City of Stockholm, Sweden, certify that Machine duly authorized to sign for

has/have issued and signed the foregoing document.

NOTARIUS PUR

Stockholm Sweden

Ex officio

Date ..

Advokat Mathias Wiberg

AFFIDAVIT

KINGDOM OF SWEDEN

CITY OF UPPSALA

§ §

My name is Magnus Almén. I am Chief Executive Officer and an officer of nWise 1. AB, an Applicant for direct video numbering access to the Telecommunications Relay Service Numbering Directory.

- 2. I swear and affirm that I have first-hand knowledge of the of the accuracy and completeness of the facts provided in nWise AB's Direct Video Numbering Directory Access Application, that I am competent to testify to the accuracy and completeness those facts, and that I have the authority to make this Supplement on behalf of nWise AB.
- 3. I further swear and affirm that the description of, and capability to, provide services described in nWise AB's Direct Video Numbering Directory Access Application Supplement are accurate and complete, that nWise AB meets the definition of "Direct Video Customer Support" as set forth in 47 C.F.R. §64.601(15), that nWise AB is qualified technically and otherwise to serve as a Qualified Direct Video Entity in aware of, and in compliance with attendant regulatory obligations

Magnus Almén

Chief Executive Officer

nWise AB Salagatan 16A

SE-753 30 Uppsala Sweden Telephone: +46 8 1200 2600

Direct (USA): 415.854.8159

Email: magnus.almen@nwise.se

SWORN TO AND SUBSCRIBED before me on this

13 day of October 2021, NOTARIUS PUB

Notary Public

My commission expires:

SEAL